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Department Stores, Inc.
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **SOUTHERN DIVISION**

11 SASHA SUCHITE,

12 Plaintiff,

13 v.
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15 KOHL'S DEPARTMENT STORES,
INC.,

16 Defendant.
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Case No. 8:15-cv-01535-JLS-DFM
(Hon. Josephine L. Staton)

**DECLARATION OF CATHERINE D.
LEE IN SUPPORT OF JOINT
STIPULATION EXTENDING TIME
TO COMPLETE DISCOVERY**

*[Joint Stip. and [Proposed] Order filed
concurrently herewith]*

FAC Filed: Oct. 27, 2015
Trial Set: Jan. 24, 2017

DECLARATION OF CATHERINE D. LEE

I, Catherine D. Lee, declare as follows:

1. I am an associate at Kelley Drye & Warren LLP, counsel of record for Defendant Kohl's Department Stores, Inc. ("Defendant" or "Kohl's"). I make this Declaration in support of the Stipulation Extending Time to Complete Discovery in this matter. I have personal knowledge of the facts set forth herein. I could and would competently testify to the matters stated herein.

2. On February 10, 2016, this Court issued a Scheduling Order in this case, and set a date for Fact Discovery Cut-off of August 30, 2016.

3. Since that time, both parties have been working diligently to request discovery and provide responses to same.

4. Simultaneously, counsel for Plaintiff Sasha Suchite and Defendant have been working to resolve this matter amicably. To the extent that the parties are unable to reach an amicable resolution, the parties may need to seek additional discovery in this matter.

5. This case has been submitted, along with other cases pending nationwide against Kohl's for alleged violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq., to the Judicial Panel on Multidistrict Litigation ("JPML"). The parties are determining whether to move to stay this action pending the determination of the JPML.

6. After meeting and conferring with counsel for Plaintiff Sasha Suchite, counsel has Stipulated and Agreed to extend the time to complete discovery by 30 days until September 30, 2016, subject to the Court's approval, which would allow both parties to better assess what discovery remains to be completed, whether to request to stay this action pending a determination by the JPML, and moreover would allow both parties to work towards a final resolution of this matter.

I declare under penalty of perjury under the laws of the United States of

1 America that the foregoing is true and correct.

2 Executed on August 29, 2016, in Los Angeles, California.

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5 CATHERINE D. LEE

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